

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

CITY OF CHESTER, PENNSYLVANIA,

Debtor.

Chapter 9

Case No. 22-13032

Judge Ashely M. Chan

**VERIFIED STATEMENT OF THE AD HOC COMMITTEE  
OF RETIRED MUNICIPAL EMPLOYEES OF  
CHESTER, PENNSYLVANIA UNDER BANKRUPTCY RULE 2019**

Jenner & Block LLP (“**Jenner**”) and Flaster/Greenberg (“**Flaster**”), counsel for the Ad Hoc Committee of Retired Municipal Employees of the City of Chester, Pennsylvania (the “**Ad Hoc Retiree Committee**”), submit this verified statement (“**Statement**”) under Rule 2019 of the Federal Rules of Bankruptcy Procedure and respectfully state:

1. On February 8, 2022, Michael Doweary (the “**Receiver**”), as the receiver for the City of Chester, Pennsylvania (the “**City**”), received written authorization to file a municipal debt adjustment action on behalf of the City from the Secretary of the Pennsylvania Department of Community and Economic Development.
2. On November 10, 2022, the Receiver caused the City to file a petition for protection under chapter 9 of the Bankruptcy Code.
3. On December 13, 2022, the Ad Hoc Retiree Committee retained Jenner and Flaster, respectively, as counsel in connection with this chapter 9 case.

4. In accordance with Bankruptcy Rule 2019, the names of the individuals appointed to the Ad Hoc Retiree Committee are: Randy Bothwell, Alan Davis, Ed McClellan, Chuck Bolgunas, Steve Quigley, Jack Gresch, and Mark Sarnocinski.<sup>1</sup>

5. Each of the individuals listed in Paragraph 4 is a retired municipal employee of the City and holds claims against the City for pension and other post-employment benefits.

6. By filing this Verified Statement, the Ad Hoc Retiree Committee makes no representation regarding the amount, allowance, or priority of such claims and reserves all rights with respect thereto.

7. Nothing contained in this Verified Statement should be construed as a limitation upon, or waiver of, any Ad Hoc Retiree Committee member's right to assert, file, or amend his or her claim(s) in accordance with applicable law and any orders entered in this chapter 9 case, including any order establishing procedure for filing proofs of claim.

8. The Ad Hoc Retiree Committee reserves the right to amend or supplement this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019.

*(Signature page follows.)*

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<sup>1</sup> To protect the privacy of the members of the Ad Hoc Committee, their home addresses are not included in this Verified Statement. Also, to be clear, the undersigned is informed that Mr. Sarnocinski will become a Retiree on January 1, 2023.

Dated: December 14, 2022

/s/ William J. Burnett

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